

Before the
Federal Communications Commission
 Washington, DC 20554

In the Matter of:
 Revision of Procedures Governing
 Amendments To FM Table of
 Allotments and Changes
 Of Community of License in the Radio
 Broadcast Services

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) MB Docket No. 05-210
) RM - 10960
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**COMMENTS OF LARAMIE B. GUEST AND FRANK G. McCOY (collectively,
 "Joint Commenters")**

Laramie B. Guest and Frank G. McCoy (collectively, "Joint Commenters") hereby submit these comments on the Notice of Proposed Rule Making (the "NPRM") released on June 14, 2005,¹ in the above-referenced proceeding.

Introduction

The Joint Commenters respond to the proposal to "... seek comment on whether and how best to enable electronic filing of proceedings to amend the Table."²

Given that there are more rulemakings being filed today, an increased burden has been placed on the FCC staff and has greatly increased the amount of time it takes to process each proposal. Further, if the Commission agrees that some changes that currently require a petition may in future be made by minor change application, some of this burden will be shifted to the application division. The logical answer is to hire more staff, but budgetary constraints make this virtually impossible.

¹ Revision of Procedures Governing Amendments To FM Table of Allotments and Changes Of Community of License in the Radio Broadcast Services, *Notice of Proposed Rule Making*, MB Docket No. 05-210, RM-10960, FCC 05-120 (Jun. 14, 2005).

² *NPRM* at ¶¶ 39.

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Discussion

Joint Commenters believe that some form of automated processing system would free FCC staff resources while allowing most petitions for rule making and applications to be processed immediately while avoiding staff gridlock.

The majority of petitions filed at the FCC do not require any special processing by the FCC staff. By using an automated system as a processing/granting mechanism, the FCC staff's efficiency would be greatly increased by only having to "sign off" on petitions granted by the system. The system could also be used to check the technical acceptability of a proposal, and if defective, the FCC staff would need only review the automated system's reason for dismissal to find the deficiency. Clearly, not all petitions could be processed automatically. Exceptions would still require processing by the FCC staff.

The automated processing system could also be used to process and grant minor change applications with minimal staff involvement. The staff would still need to check the results, but this would take a fraction of the time now required to process applications.

It would also be possible to check all technical aspects of a typical application and verify that it is truly acceptable for filing. Applications that require more complex processing would still need to be processed by the FCC staff.

The automated processing system would be an integrated software package that would most likely initially be implemented to process typical minor change applications. As the system proves itself, more processing features would be added to allow for more complex applications and petitions for rule making to be processed. Initially, the system should be capable of checking 73.207 and 73.215 spacing requirements, tower registration coordinates, and community coverage. This would open up the capability to process minor change applications.

It is our belief that such a system is feasible and can be built upon the existing infrastructure already in place at the Commission. Today, most applications are submitted electronically through the Consolidated Data Base. By requiring that petitions for rule making

also be filed electronically, the petitioner would be responsible for entering the technical information electronically. Once entered, the data would immediately be available for processing with no FCC staff intervention.

Conclusion

We believe that the technology of the day would allow such a proposal to enhance processing time while significantly reducing staff resources.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Frank R. Jazzo", written over a horizontal line.

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